

**Commonwealth of Kentucky
Division for Air Quality**

RESPONSE TO COMMENTS

ON THE CONDITIONAL MAJOR DRAFT PERMIT NO. F-07-028

SOMERSET RECYCLING SERVICES, INC.

1 RECYCLE WAY, SOMERSET, KY 42503

JULY 13, 2007

JULIAN BRECKENRIDGE, REVIEWER

SOURCE I.D. #: 021-199-00098

SOURCE A.I. #: 54848

ACTIVITY #: APE20070001

SOURCE DESCRIPTION:

Somerset Recycling Services, Inc. located in Somerset, KY recycles clean, surplus, and quality rejected products. Their process uses various sizes of grinders to reduce the incoming products to a flake-type material, which is sold to post-secondary plastic manufactures. The first three machines grind hard plastic into chips. Each has its own cyclone (80% efficiency). Grinder #1 has its own in-line baghouse (99.9% efficiency) downstream of the cyclone while units #2 and #3 are connected to a second baghouse downstream (99.9% efficiency) of their respective cyclones. Both baghouse units vent into the building. The combined control efficiency for each unit (1-3) is 99.98%. Machine #4 is a pre-grinder that merely breaks the original-sized hard plastic parts in a manageable size for Units 1-3. Machine #4 (pre-grinder) does not have a control device attached. Grinders #5-10 are used to grind plastic bags into a flake product. All six units (5-10) are identical. Each plastic bag grinder uses water to control dust (75% efficiency) and to aid in the grinding process. In addition to the water suppression, each unit has a cyclone of 80% efficiency. The exhaust from the each cyclone is ducted into its own dedicated final bag collector (50% efficiency) located outside for ease in particulate disposal. The combined control efficiency for each unit (5-10) is 97.5%.

PUBLIC AND U.S. EPA REVIEW:

On June 8, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Commonwealth Journal* in Somerset, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Somerset Recycling Services, Inc. of Somerset, Kentucky on June 20, 2007. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.

ATTACHMENT A

Response to Comments

Comments on Somerset Recycling Services, Inc. Draft Conditional Major Air Quality Permit submitted by Sam Gibson of Somerset Recycling Services, Inc.

Only one comment was received and is displayed accordingly with the Division's response following that comment (See Attachment B for the copy of the Comments on Draft Conditional Major):

COMMENT

We have noticed 2 different areas in the paperwork that contain a typo. Please note page 4 of 18 (b):

It is our understanding that Somerset Recycling shall perform a qualitative visual observation of the opacity of emissions from Stacks PBS# 5- PBS#10 at least once per MONTH.

On page 3 of 4 (b), the permit statement of basis states once per WEEK.

*Division's Response: Comment acknowledged; the Division has made the correction to the Statement of Basis regarding the performance of qualitative visual observations of the opacity of emissions from Stacks PBS# 5- PBS# 10 to at least once per **month** just as stated in the permit.*

ATTACHMENT B

(Copy of the Comments of the Draft Conditional Major Permit)